

THE LAW OFFICES OF SEAN M. MAHER, PLLC

December 20, 2022

VIA ECF

Honorable Ronnie Abrams
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Application granted.

SO ORDERED.



Ronnie Abrams, U.S.D.J.
December 20, 2022

**RE: *United States v. Irvin Cartagena et al.*, 22 Cr. 92 (RA)
Joint Request to Adjourn Motions Deadlines**

Dear Judge Abrams:

On behalf of all defense counsel and the government, I write to inform the Court that all the parties jointly request an additional adjournment of the due date for defense motions. The parties have continued to be engaged in productive plea negotiations and are in advanced stages of reaching a resolution. With an additional adjournment, it is expected that the matter will reach a resolution without the need for motions or trial. This is the third request on consent from or jointly with the government for an adjournment.

Under the current schedule, defense motions are due on December 27, the government's response is due on January 10, and defense replies are due on January 17. Should the Court grant an adjournment, the dates would shift to January 27, February 10, and February 17. This would still leave sufficient time for the Court to review and rule on the motions before the trial on May 15, 2023. AUSA Micah Fergenson has informed me that the government approves this joint request for an adjournment.

Thank you for your consideration.

Respectfully submitted,

/S/

Sean M. Maher
Counsel for Irvin Cartagena

cc: All counsel via ECF

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